

DOCKET NO. WWM-CV15-6009136 S

MELANIE PEREZ	:	SUPERIOR COURT
<i>Plaintiff</i>	:	
	:	
v.	:	JUDICIAL DISTRICT OF HARTFORD
	:	
STATE OF CONNECTICUT	:	
JUDICIAL DEPARTMENT	:	
<i>Defendant</i>	:	SEPTEMBER 11, 2015

**PLAINTIFF’S OBJECTIONS TO DEFENDANT’S FIRST SET OF
INTERROGATORIES
AND REQUEST FOR PRODUCTION**

(A)

Pursuant to Connecticut Practice Book § 13-7 *et seq.*, Plaintiff, Melanie Perez, hereby objects and/or responds to Defendant, State of Connecticut Judicial Department’s First Set of Interrogatories and Request for Production, dated June 8, 2015. Plaintiff reserves the right to amend and/or supplement these responses as needed

A. **INSTRUCTIONS**

1. The defendant requests that the plaintiff answer the following Interrogatories, separately and fully in writing, under oath, within thirty (30) days of service hereof, pursuant to P.B. § 13-7.

2. In answering these Interrogatories, the plaintiff must furnish all information, including hearsay, in the possession of her attorney, agents, investigators, and all other persons or entities acting on her behalf, and not merely information within her personal knowledge. The plaintiff’s answers to these Interrogatories must reflect all information available to her as described above.

3. To the extent that the plaintiff refuses to answer any of the following Interrogatories based on an objection or the assertion of any type of privilege, she must explain the grounds for the assertion of the objection or privilege. The plaintiff must respond to any Interrogatory to which she objects to the extent that her response does not conflict with or waive her objection or assertion of privilege.

4. The Interrogatories which follow are continuing in nature to the extent that P.B. § 13-15 permits. Therefore, the plaintiff must provide, by way of supplementary answers, such additional information as the plaintiff or any other person acting on her behalf may hereafter obtain which will augment or otherwise modify the answers the plaintiff now gives to these Interrogatories.

B. **DEFINITIONS**

1. "Identify" or "identity," when referring to a natural person, means to identify that person sufficiently to enable the defendant to cause him or her to be served with process requiring his or her attendance at a deposition or place of other type of examination. The identification must include his or her full name, present or last known address, present or last telephone number, present or last known business affiliation and address, title or occupation, and each of the positions such person held during the time covered by any answer to these interrogatories referring to such person;

2. "Identify" or "identity," when referring to a document means to describe it sufficiently to identify it "with reasonable particularity." The identification must include the following information with respect to such document:

a) the author of the document;

- b) the date appearing on the document, and if it has no date the answer must so state and must give the date or approximate date the document was prepared;
- c) the general nature or description of the document;
- d) the name of the person, if any, to whom the document was addressed and the name of each person other than such addressee to whom the document or copies thereof were given or sent, if any; and;
- e) the name and address of the person having present possession, custody or control of the document.

3. "Document" or "documentation" means the original or copies of any written, recorded or graphic matter, however produced or reproduced, including but not limited to, any book, diary, pamphlet, periodical, letter, correspondence, telegram, invoice, contract, purchase order, estimate, report, memorandum, intra-office communication, working paper, record, study paper, worksheet, estimating sheet, bid, bill, record, timecard, work record, chart, graph, index, computer printout, data sheet, data processing card or tape, recording, transcription thereof, and all other memorials of any conversations, meetings and conferences, by telephone or otherwise, and any other writing or recording, however produced or reproduced, which are in the plaintiff's possession, custody or control, or in the possession, custody, or control of any agent or employee of the plaintiff, or of her attorney.

4. Where the singular is used with reference to any person, document, or item it must include the plural.

5. "Complaint" refers to the plaintiff's amended complaint dated August 20, 2014.

OBJECTION: Plaintiff objects to the above instructions and definitions to the extent that it imposes obligations beyond those imposed by the Connecticut Practice Book or conflicts with the obligations imposed by the Connecticut Practice Book, or to the extent that they are unduly burdensome.

C. INTERROGATORIES

1. State the plaintiff's full name, date of birth, and current residence address.

See Definitions, ¶ 1.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's current employer and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

2. State the name, address and telephone number of any person(s) who possess knowledge of any facts relating to any of the allegations contained in the Complaint dated January 26, 2015.

OBJECTION: Plaintiff objects to this interrogatory as overly broad and unduly burdensome as to "any facts relating to any of the the allegations". Plaintiff further objects to the extent this interrogatory seeks information protected from disclosure by the attorney-client privilege. Plaintiff also objects to this interrogatory as unduly burdensome as Plaintiff cannot be expected to know what knowledge others possess.

3. Paragraph 4 of the complaint states that at all times relevant to the complaint the plaintiff had a past history of physical disability as defined by Conn. Gen. Stat. § 46a-51(15) and that she "has a record of such a disability and defendant perceived her as having such a disability." Please state upon what facts the allegation is made that the plaintiff "had a past history of physical disability" and please state specifically the physical disability. Please also state upon what facts the allegation is made that the plaintiff had a record of disability and that the defendant "perceived" her as having a disability.

OBJECTION:: Plaintiff objects to this interrogatory to the extent it seeks medical records (physical, mental or otherwise) which are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects to this interrogatory to the extent it seeks

a medical opinion from an individual not qualified to provide one. Plaintiff also objects to this interrogatory as the information sought is already in Defendant's possession as Plaintiff's employer to whom medical documentation has been submitted and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

4. Paragraph 5 of the complaint states that the plaintiff suffers from a serious and chronic medical condition; that she has moderate to severe hearing disability in both ears and that she was diagnosed with this condition in 2008 and that she requires regular and ongoing medical treatment.

a. Please state when the plaintiff first notified her employer, the Judicial Department, of her "serious and chronic medical condition."

b. Please state how often the plaintiff requires medical treatment for her chronic condition and please identify the treating physician, how often she sees this medical treater and identify all prescriptions and/or medical apparatus she requires due to her chronic condition.

OBJECTION: Plaintiff objects to this interrogatory to the extent it seeks medical records (physical, mental or otherwise) which are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects to this interrogatory to the extent it seeks a medical opinion from and individual not qualified to provide one. Plaintiff also objects to this interrogatory as irrelevant and immaterial as to "all prescriptions and/or medical apparatus she requires". Plaintiff also objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer, and to whom medical documentation has been submitted, and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

5. Paragraph 11 of the complaint states that in 2011 the plaintiff "advised" the defendant of her disability.

a. Please identify to whom the plaintiff advised of her disability. See Definitions, ¶ 1.

b. Please state the form of the advisement provided the defendant.

c. Please explain whether the plaintiff's medical condition changed between 2008 and 2011, and, if so, how it changed.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer to whom Plaintiff advised and provided medical documentation and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2. Plaintiff further objects to this interrogatory to the extent it seeks a medical opinion from an individual not qualified to provide one.

6. Paragraph 12 of the complaint states that prior to plaintiff's work location being moved, she had been assigned a private office where she could close the door to block out outside background noise.

a. Please state if the plaintiff requested a private office in her former work location.

b. Please identify to whom the plaintiff made the request regarding a private office. See Definitions, ¶ 1.

c. If no request was made, please state how the plaintiff came to have a private office in her former work location.

d. Please state if the plaintiff's placement in a private office was due to her physical disability.

e. Please state if the plaintiff was the lone probation officer in her prior location who had a private office. If your answer is in the negative, please identify all probation officers who had private offices. See Definitions, ¶ 1.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer and whom assigned her work location and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

7. Paragraph 13 of the complaint states that in April 2012 the plaintiff was assigned to a cubicle space which she shared with two other employees and that she could no longer conduct closed door meetings with clients in this workspace. Paragraph 13 further states that the plaintiff could not meet clients face-to-face in her workspace.

a. Please state if any other probation officers in the 190 Main Street office had an office with a door to conduct interviews.

b. Please state upon what facts the allegation is made that the plaintiff could no longer meet "face-to-face" with clients. Please state what obstacles prevented such meetings.

c. Please state if her fellow cubicle members conducted face-to-face interviews with clients and, if so, why the plaintiff could not do so as well.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

8. Paragraph 14 of the complaint states that the plaintiff was exposed to excessive background and ambient noise in her workstation after it was moved in April 2012.

a. Please state if the plaintiff's workstation was the only workstation moved in April 2012.

b. Please describe the excessive background and ambient noise that the plaintiff was exposed to once her workstation was moved in April 2012.

c. Please state how often the excessive background and ambient noise was heard by the plaintiff.

d. Please identify who made the decision to move the plaintiff's workstation in April 2012.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

9. Paragraph 16 of the complaint states that in April 2012 the plaintiff made several inquiries about moving to a different room as a reasonable accommodation and that there were several rooms available where the plaintiff could move to block out background and ambient noise.

a. Please identify the location of the several rooms that are referred in in paragraph 16;

b. Please state if the alternative locations suggested by the plaintiff were vacant;

c. Please state if the rooms that the plaintiff suggested were occupied and, if so, what or who were in the rooms;

d. Please state if the request regarding the "several rooms" was a reasonable accommodation which would not severely impact the operations of the Judicial Department; and

e. Please identify to whom the inquiries were made.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer, and to whom the inquiries were made, and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2. Plaintiff further objects to this interrogatory as it uses the phrase "reasonable accommodation which would not severely impact the operations of the Judicial Department" which is vague and which is a misstatement of applicable law.

10. Paragraph 17 of the complaint states that the plaintiff was moved from a room with two other probation officers to a room with one other probation officer.

a. Please state upon what facts the allegation is made that this was not a reasonable accommodation made by the defendant.

b. Please identify who made the decision to move the plaintiff to the room with one other probation officer.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer, and decision maker, and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

11. Paragraph 18 of the complaint states that, despite the move, the plaintiff was exposed to "significant background and ambient noise" and that she complained to the defendant, requesting a quiet workspace. Paragraph 18 further states that the defendant denied the request.

a. Please state the specific date(s) when the plaintiff complained to the defendant despite being moved into an area with only one other probation officer;

b. Please state the form of the complaint, whether it was in writing or verbal and identify the individual(s) to whom the complaint was made. See Definitions, ¶ 1.

c. Please state in what manner the defendant denied the request and please state your understanding for the denial.

d. Please supply all documentation in support of your response to sub-parts a through c of Interrogatory No. 11.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer, and to whom the request was made to and denied by, and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

12. Paragraph 32 of the complaint states that the plaintiff has been "shunned" by her supervisor since her request for reasonable accommodation for her disability.

a. Please state upon what facts the allegation is made that the plaintiff's supervisor has "shunned" the plaintiff;

b. Please identify the manner in which the plaintiff has been shunned; please identify the date(s) when the plaintiff was shunned; the circumstances surrounding when the plaintiff was shunned; and

c. Identify each and every witness to each occasion of when the plaintiff was "shunned."

OBJECTION: Plaintiff objects to this interrogatory as unduly burdensome. Plaintiff cannot reasonably be expected to recall "each and every witness to each occasion" and "the date(s) when the plaintiff was shunned". Plaintiff further objects to this interrogatory as it is not limited in time.

13. Paragraph 33 of the complaint states that the plaintiff has been assigned to less favorable work assignments since she requested a reasonable accommodation.

a. Please state upon what facts the allegation is made that the plaintiff has been assigned "less favorable work assignments."

b. Please identify the work assignments previously received by the plaintiff that were more desirable and please state upon what facts the allegation is made that she is no longer received said assignments.

c. Please state if the work assignments received by the plaintiff are out of her work classification and, if your answer is in the affirmative, please explain.

OBJECTION: Plaintiff objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

14. Paragraph 34 of the complaint states that the defendant failed to engage in the "interactive process" and failed to provide the plaintiff with a reasonable accommodation.

a. Please state upon what facts the allegation is made that the defendant failed to engage in the "interactive process" when at one juncture the plaintiff's workstation was changed at her request.

b. Please also state upon what facts the allegation is made that the plaintiff was not the recipient of a reasonable accommodation.

OBJECTION: Plaintiff objects to this interrogatory as it seeks a legal opinion from an individual not qualified to give one.

15. Paragraph 37 of the Complaint states that the plaintiff has suffered damages, including but not limited to lost wages, lost employment benefits, emotional distress, loss of enjoyment of life and loss of enjoyment of profession. "

a. Please state with specificity what "lost wages" the plaintiff suffered.

b. Please state with specificity what actions taken by the defendant are the cause of the plaintiff's damages.

c. Please state with specificity what "lost employment benefits" the plaintiff is referencing. Please identify each and every benefit that the plaintiff has been deprived.

d. Please identify what "loss of enjoyment of profession" to which the plaintiff is referencing.

e. Please supply all supporting documentation to support the responses to sub-parts a through d of Interrogatory No. 15.

OBJECTION: Plaintiff objects to this interrogatory to the extent it seeks information and documents protected from disclosure by the attorney-client privilege and work product doctrine. Plaintiff further objects to this request to this interrogatory to the extent it seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects to this interrogatory as some of the information is already in Defendant's possession as Plaintiff's employer and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

16. Paragraph 37 of the Complaint, states that the plaintiff has suffered "emotional distress."

a. Please state, in detail, how the plaintiff' emotional distress have manifested, including whether the Plaintiff has sought treatment of any kind as a result.

b. If the Plaintiff has sought and/or received medical treatment (including physical, psychiatric, mental, or otherwise) for any emotional distress or upset as a result of actions of the defendant from any hospital, clinic, physician, psychologist, nurse social worker or other health care provider, please identify each such hospital, clinic, physician, psychologist, nurse, social worker or other health care provider from whom the Plaintiff sought and/or received such

diagnosis, examination or treatment, the date(s) of seeking and/or receiving such health care, whether the physician and/or other health care provider rendered an opinion respecting the nature and extent of the injuries, conditions, disabilities claimed by the Plaintiff and describe the opinion, diagnosis and treatment of such health care provider.

c. Please identify any health care provider the Plaintiff has seen in regard to any psychological, mental or emotional condition, disease, disability or defect in the last ten (10) years, and describe said condition, disease, disability or defect, when it was first discovered or diagnosed and by whom.

OBJECTION: Plaintiff objects to this interrogatory to the extent it seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects as some of the information sought is in Defendant's possession and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2 as Defendant has been provided with medical documentation concerning medical diagnoses and/or treatment when Plaintiff was employed with Defendant. Plaintiff further objects to the use of the term "injuries" as vague.

17. With regard to paragraph 39 of the Complaint, it states that the defendant's failure to engage in the interactive process and to provide the plaintiff with a reasonable accommodation violated the plaintiff's right to be free of discrimination.

a. Please state what injuries the Plaintiff has sustained as a result of the alleged discriminatory acts done by the Judicial Department.

b. Please state what alleged discriminatory acts done by the Judicial Department have incurred these injuries.

c. Please state when the injuries were sustained, along with any medical documentation supporting these claims.

d. Please identify any health care provider the Plaintiff has seen, and all medical treatment obtained, in connection with these injuries.

OBJECTION: Plaintiff objects to the use of the term “injuries” as vague and ambiguous. Plaintiff further objects to this interrogatory to the extent it seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects to this interrogatory as duplicative and hereby incorporates her objections to Interrogatory Nos. 12 – 16 above.

18. Paragraph 40 of the Complaint alleges that the plaintiff has been "sustained economic and non-economic damages...." Please itemize with particularity any and all monetary damages, whether potential or actual, which you claim to have incurred, or will incur, as a result of any of the allegations in your complaint asserted against the defendant. In addition, please set forth in complete detail the dollar value of each element of claimed damages. Please supply all documentation in support of your calculations regarding economic loss. Identify any documents relied upon, referred to or related to in your response to this interrogatory.

OBJECTION: Plaintiff objects to the extent this interrogatory seeks information beyond that required by Connecticut Practice Book §13-4. Plaintiff further objects on the basis of the attorney-client privilege and the work product doctrine. Plaintiff also objects to this interrogatory as premature as this action is ongoing. Plaintiff also objects to this interrogatory as the value of non-economic damages will be determined by the jury at the time of trial. Plaintiff further objects to this interrogatory as overly broad and unduly burdensome as to “any documents relied upon, referred to or related to in your response”. Plaintiff also objects to this interrogatory as overly broad and unduly burdensome as to “any documents relied upon, referred to or related to your response”.

19. If the plaintiff has sought and/or received any medical diagnosis, treatment, examination or other services (including psychological, psychiatric, mental, physical, emotional distress or otherwise) for the injuries alleged in the Complaint from any hospital, clinic, physician, psychologist, nurse, social worker or other health care provider, please identify each such hospital,

clinic, physician, psychologist, nurse, social worker or other health care provider from whom you sought and/or received such diagnosis, treatment, examination or other service; state the date(s) upon which any such healthcare was sought and/or received, and whether the physician and/or other healthcare provider rendered an opinion respecting the nature and extent of the injuries, conditions, disabilities claimed by the plaintiff; and describe the opinion, diagnosis and treatment of such health care provider.

OBJECTION: Plaintiff objects to this interrogatory to the extent it seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects as some of the information sought is in Defendant's possession and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2 as Defendant has been provided with medical documentation concerning medical diagnoses and/or treatment when Plaintiff was employed with Defendant. Plaintiff further objects to the use of the term "injuries" as vague and ambiguous. Plaintiff also objects to this interrogatory as duplicative of Interrogatory No. 16.

20. Please state if in the last ten (10) years, the plaintiff has sought and/or received medical diagnosis, treatment or any other services for any mental illness, mental condition, psychiatric condition, emotional condition, addiction to a controlled substance and/or for emotional distress from any hospital, clinic and/or other medical practitioner, physician, psychologist, psychiatrist, therapist, nurse, counselor, social worker or other health care provider; identify each such hospital, clinic and/or other medical practitioner, physician, psychologist, psychiatrist, therapist, nurse, counselor, social worker or other health care provider from whom you sought and/or received any such diagnosis, treatment or other service, the date(s) when you sought and/or received such treatment(s), and the physician and/or health care provider who rendered an opinion respecting the nature and extent of the injuries, conditions, and disabilities; and describe the opinion, diagnosis and/or treatment rendered by such health care provider.

OBJECTION: Plaintiff objects to this interrogatory to the extent it seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects to this interrogatory as overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence as it requests information concerning “any other services for any mental illness, mental condition, psychiatric condition, emotional condition, addiction to a controlled substance and/or for emotional distress”. Plaintiff further objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks medical information concerning “the last ten (10) years”.

21. At any time between May 1993 and the present date, did plaintiff tape record or record by any electronic means, any conversation with any person employed by State of Connecticut Judicial Department, the contents of which might pertain in any way to the allegations contained in this complaint? If your answer is in the affirmative, please identify the individual(s) on the tape recording or other electronic mean. See Definitions, ¶ 1.

OBJECTION: Plaintiff objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information for “any time between May 1993 and the present date” and “any conversation with any person employed by State of Connecticut Judicial Department, the contents of which might pertain in any way to the allegations”.

22. Please state whether the Plaintiff or any individual named in response to any of these Interrogatories to the Plaintiff’s knowledge, or to the knowledge of her attorney, has given any statement regarding the subject matter of this case or concerning the actions of any party or witness thereto (except privileged statements made by a party in confidence to his or her attorney) and if so, identify each person having knowledge of such statements and those having custody or copies of such statements.

OBJECTION: Plaintiff objects to this interrogatory as overly broad and unduly burdensome as to “any statement regarding the subject matter of this case or concerning the actions of any party or witness thereto”. Plaintiff further objects to this interrogatory as unduly burdensome as to “each person having knowledge of such statements”. Plaintiff also objects to this interrogatory to the extent it seeks information and/or documents protected from disclosure by the attorney-client privilege and/or work product doctrine.

23. Please identify the name, address and telephone number of any person(s) whom you believe or know may possess facts relating in any manner to the allegations set forth in the Complaint or the answers to these interrogatories and describe the content of such person’s knowledge. Summarize the knowledge of or the testimony you expect to elicit or have elicited from such person(s). See Definitions, ¶ 7

OBJECTION: Plaintiff objects to this interrogatory as overly broad and unduly burdensome as to “any person(s) whom you believe or know may possess facts relating in any manner to the allegations”. Plaintiff further objects to this interrogatory as unduly burdensome as Plaintiff cannot reasonably be expected to “describe the contents of such person’s knowledge”.

24. Please state whether the Plaintiff, her attorney, or any other representative has any photographs, drawings, charts, diagrams, maps, models or other tangible evidence prepared by parties, witnesses or experts expected to testify in this case concerning any of the events alleged in the Complaint. If so, identify any person(s) who have custody or control of any of the materials referred to above, specifically describing which of the materials each such person possesses and the contents of such.

OBJECTION: Plaintiff objects to this interrogatory as premature. Plaintiff has not yet disclosed experts or witnesses expected to testify.

25. State the name, address and telephone number of any person(s) who possess knowledge of any facts relating to any of the allegations contained in the Complaint or answers to these Interrogatories. Summarize the facts that you expect to elicit or have elicited from such person(s).

OBJECTION: Plaintiff objects to this interrogatory as overly broad and unduly burdensome as to “any person(s) who possess knowledge of any facts relating to any of the allegations contained in the Complaint or answers to these Interrogatories.” Plaintiff further objects to this interrogatory as unduly burdensome as Plaintiff cannot reasonably be expected to know what knowledge another person possess. Plaintiff further objects to this interrogatory as duplicative of Interrogatory No. 23 above.

26. State whether you have ever filed a lawsuit, complaint, or grievance of any kind other than the instant lawsuit. If your answer is affirmative, identify the agency with which you filed the lawsuit, grievance or complaint, the date upon which such lawsuit, grievance or complaint was filed, the identity of the person(s) complained of, and the disposition of the matter.

OBJECTION: Plaintiff objects to this interrogatory as overly broad, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence as it seeks whether Plaintiff “ever filed a lawsuit, complaint, or grievance of any kind other than the instant lawsuit.”

(B)

DEFENDANT'S FIRST REQUEST FOR PRODUCTION AND DISCLOSURE

Pursuant to Connecticut Practice Book §§ 13-9 through 13-10, inclusive, the defendant requests the plaintiff to produce, or allow counsel for the defendant an opportunity to inspect and copy the following:

Please organize and label each production to correspond with each respective request so that it is clear to which Request your production is responsive.

INSTRUCTIONS

(a) Defendant requests include all documents in the possession, custody, or control of the plaintiff not already provided to the defendant. If your response to any request herein is that the documents are not in your possession, custody, or control, explain in detail the unsuccessful efforts made to locate the documents.

(b) If your response to any request herein is that the documents are not in your possession, custody, or control, identify who has possession, custody, or control of the documents and where they are located.

(c) State the date each document was written and a descriptive title of each document.

(d) When a document has been destroyed or is alleged to have been destroyed, state the date of its destruction, the reason for its destruction, identify each person responsible for its destruction, providing his or her name, present position, business and home address, and telephone number.

(e) If you contend that any document is privileged or otherwise excludable from production and decline to produce it, provide the following information for each

document: the present position, business and home address, and telephone number of the author and any address(es); the name, present position, business and home address, and telephone number of every recipient of the original and any copy of the document; the name, present position, business and home address, and telephone numbers of each person who now has the original or any copy; the nature of the claim of privilege; a general description of the contents of the document being withheld, and the date of the document.

(f) To the extent that you consider any of the following document requests objectionable, answer or respond to so much of each document request and each part thereof as is not objectionable in your view, and separately state your part of each document request and each part thereof as is not objectionable in your view, and separately state your part of each document request as to which you raise objection and each ground for each such objection.

(g) These document request specifications are considered to be continuing in character. You are, therefore, required promptly to produce additional documents as you obtain further or different information or additional responsive documents prior to hearing.

(h) Concerning documents identified in response to the interrogatories set forth above, all documents shall be segregated in accordance with the numbered and lettered paragraphs and subparagraphs herein.

OBJECTION: Plaintiff objects to the above instructions and definitions to the extent that it imposes obligations beyond those imposed by the Connecticut Practice Book or conflicts with the obligations imposed by the Connecticut Practice Book, or to the extent that they are unduly burdensome.

PRODUCTION AND DISCLOSURE REQUEST

1. All documents identified in answering or used or relied upon by the plaintiff in preparing answers to any of the defendant's interrogatories.

OBJECTION: Plaintiff objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or work product doctrine. Plaintiff also hereby incorporates her objections to the foregoing interrogatories hereto.

2. Produce all documents that support the allegations in the Complaint.

OBJECTION: Plaintiff objects to this request as overly broad. Plaintiff further objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or work product doctrine.

3. All documents that relate to any alleged loss, damage, suffering, injury, distress or harm you sustained relating to or resulting from any of the events or circumstances alleged in your complaint.

OBJECTION: Plaintiff objects to this request as overly broad as to "any of the events or circumstances". Plaintiff further objects to the use of the term "injury" as vague. Plaintiff also objects as this request seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t). Plaintiff further objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or work product doctrine.

4. All documents, including but not limited to, notes, e-mails, diaries, Facebook entries, Twitter tweets, Blog posts or other writings kept by plaintiff, that relate or refer to allegations in the Complaint.

OBJECTION: Plaintiff objects to this request as overly broad as to "that relate or refer to allegations in the Complaint". Plaintiff further objects as some of the documents sought are in Defendant's possession and cannot be produced with

substantially greater facility per Connecticut Practice Book §13-2 as Defendant is the employer and would therefore possess email communications among and between Plaintiff and Defendant. Plaintiff further objects to this request as vague as to the use of the phrase “kept by plaintiff”.

5. Please provide fully executed medical authorization form (attached) for each treating health care provider identified in your response to Interrogatory No. 19.

OBJECTION: Plaintiff incorporates her objection to Interrogatory No. 19. Plaintiff further objects to providing blanket written authorizations. Plaintiff also objects as this request seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t).

6. Produce a copy of each tape or electronic recording identified in Interrogatory No. 21 above.

OBJECTION: Plaintiff incorporates her objection to Interrogatory No. 21 above.

7. If lost wages or loss of future earning capacity are claimed as items of damages in this lawsuit, provide copies of the plaintiff's federal and state income tax returns, including all forms and schedules, for the three (3) tax years immediately preceding the tax year in which the alleged injuries were incurred and all tax returns from the date of the injury through the present.

OBJECTION: Plaintiff objects to this request to the extent it seeks tax documents which are personal and confidential. Plaintiff further objects to this interrogatory as the information is already in Defendant's possession as Plaintiff's employer and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2.

8. Produce all written requests for a reasonable accommodation submitted by the plaintiff to the defendant Judicial Department.

OBJECTION: Plaintiff objects to this request as the documents sought are in Defendant's possession and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2 as the requests were submitted to Defendant. Plaintiff also objects as this request seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t).

9. Produce all medical certifications submitted by the plaintiff to the defendant Judicial Department regarding her disability and please supply the date(s) when the medical documentation was submitted.

OBJECTION: Plaintiff objects to this request as the documents sought are in Defendant's possession and cannot be produced with substantially greater facility per Connecticut Practice Book §13-2 as the certifications were submitted to Defendant. Plaintiff also objects as this request seeks medical records (physical, mental or otherwise) that are privileged communications protected from disclosure pursuant to Connecticut General Statutes §52-146(c) through §52-146(t).

PLAINTIFF,
MELANIE PEREZ

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CERTIFICATION

I hereby certify that a copy of the foregoing Plaintiff's Objections to Defendant's First Set of Interrogatories and Requests for Production of Documents was sent by first class mail, postage prepaid, to the following counsel of record on this 11th day of September, 2015.

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/s/Magdalena B. Wiktor
Magdalena B. Wiktor